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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL TATUM

Plaintiff,

vs.

KEOLIS TRANSIT AMERICAN, INC, a
corporation; DOE INDIVIDUALS I-X; ROE
CORPORATIONS I-X,

Defendants.

Case No.: 2:21-cv-444 -APG-DJA

**Stipulation and Order to Extend
Discovery (First Request)**

I. DISCOVERY COMPLETED TO DATE

1. A Rule 26(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
2. Both parties have served Rule 26(a)(1) disclosures. Defendants have made initial disclosures, and supplements thereto.
3. Plaintiff has responded to Defendants' written discovery.

II. DISCOVERY TO BE COMPLETED

1. Depositions of various witnesses including, but not limited to:
 - a. Defendant's FRCP 30(b)(6) designees;
 - b. Defendant's employees;
 - c. Plaintiff,

- d. Plaintiff's treating physicians;
- e. The parties retained experts; and
- f. Other witnesses as needed

- 2. Additional written discovery;
- 3. Initial and Rebuttal Expert Disclosures, if any, and
- 4. Other discovery as needed.

III. **WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE SCHEDULING ORDER.**

Good cause exists to grant a discovery extension in this case. Defendants are in need of more time to obtain medical records now that authorizations have been provided. Obtaining these records then influences the parties' ability to prepare for expert disclosures and depositions. While the parties have been diligent, they do not control how quickly the medical facilities respond to the requests.

The parties also seek additional time to conduct any other discovery deemed necessary. Therefore, the parties are being proactive by requesting that discovery be extended to the time frame below:

IV. **PROPOSED SCHEDULE FOR COMPLETEING REMAINING DISCOVERY**

DISCOVERY	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosure	06/17/2021	09/15/2021
Rebuttal Expert Disclosure	07/19/2021	10/17/2021
Close of Discovery	09/13/2021	12/13/2021
Dispositive Motions	10/15/21	01/13/2022
Pretrial Order	11/19/21	02/17/2022

1 DATED this 25th day of May, 2021.

DATED this 25th day of May, 2021.

2 **ZAMAN & TRIPPIEDI, PLLC**



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10 **ORDER**

11 IT IS SO ORDERED.

12 Dated this 26th day of May, 2021.

A handwritten signature in blue ink, appearing to be 'J. [unclear]', written over a horizontal line.

14 **UNITED STATES MAGISTRATE JUDGE**